

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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Maria del Carmen Mendez Castro; Ramiro Gonzalez Juarez; Rodrigo Galindo Gutierrez; Jahir Alfonso Vergara Maza; Jose Luis Gonzalez Juarez; Sara Mendez Castro; Brandon Brito Gonzalez; Marco Antonio Olivares Perez; Roberto Antonio Cuamba Razo; and John Doe 1-20.

Plaintiffs,

v.

MIDWEST RIDES and Concessions Inc.; Mad-Jax Amusements Inc., including dba Midwest Rides and Concessions; James Waknitz; Rochelle Waknitz; ATJ Labor Consulting LLC; Alejandro Trevino Jr.; T.J. Reinke; and John Doe,

Defendants.

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Case No. 16-CV-00014 (DWF/JJK)

**ANSWER OF DEFENDANTS ATJ  
LABOR CONSULTING LLC AND  
ALEJANDRO TREVINO JR.**

**DEMAND FOR JURY TRIAL**

Defendants ATJ Labor Consulting LLC (“ATJ”) and Alejandro Trevino Jr. (“Trevino”) (jointly, “Defendants”), by their undersigned attorneys, and for their Answer to Plaintiffs’ Complaint in the above-entitled matter, hereby deny each and every allegation, matter, and thing contained in Plaintiffs’ Complaint except as hereinafter expressly admitted, qualified or otherwise stated, and further answer the Complaint as follows:

## **JURISDICTION AND VENUE**

1. Paragraph 1 of Plaintiffs' Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the cited jurisdictional provisions speak for themselves.

2. Paragraph 2 of Plaintiffs' Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the cited jurisdictional provisions speak for themselves.

3. Paragraph 3 of Plaintiffs' Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the cited jurisdictional provisions speak for themselves.

4. Paragraph 4 of Plaintiffs' Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the cited jurisdictional provisions speak for themselves.

5. Paragraph 5 of Plaintiffs' Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the cited jurisdictional provisions speak for themselves.

6. Paragraph 6 of Plaintiffs' Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the cited jurisdictional provisions speak for themselves.

7. Paragraph 7 of Plaintiffs' Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the law

regarding supplemental jurisdiction speaks for itself. Please also see Defendants' affirmative and other defenses.

8. With respect to Paragraph 8 of Plaintiffs' Complaint, Plaintiffs' allegation regarding the Court's personal jurisdiction is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the law regarding personal jurisdiction speaks for itself. Defendants lack sufficient information to admit or deny the remaining allegations in Paragraph 8 of Plaintiffs' Complaint and therefore deny same.

9. With respect to Paragraph 9 of Plaintiffs' Complaint, Plaintiffs' allegation regarding the Court's personal jurisdiction is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the law regarding personal jurisdiction speaks for itself. Defendants lack sufficient information to admit or deny the remaining allegations in Paragraph 9 of Plaintiffs' Complaint and therefore deny same.

10. With respect to Paragraph 10 of Plaintiffs' Complaint, Plaintiffs' allegation regarding the Court's personal jurisdiction is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the law regarding personal jurisdiction speaks for itself. Defendants lack sufficient information to admit or deny the remaining allegations in Paragraph 10 of Plaintiffs' Complaint and therefore deny same.

11. With respect to Paragraph 11 of Plaintiffs' Complaint, Plaintiffs' allegation regarding the Court's personal jurisdiction is a legal conclusion to which no response is

required. To the extent a response is required, Defendants state that the law regarding personal jurisdiction speaks for itself. Defendants lack sufficient information to admit or deny the remaining allegations in Paragraph 11 of Plaintiffs' Complaint and therefore deny same.

12. With respect to Paragraph 12 of Plaintiffs' Complaint, Plaintiffs' allegation regarding the Court's personal jurisdiction is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the law regarding personal jurisdiction speaks for itself. Defendants deny the remaining allegations in Paragraph 12 of Plaintiffs' Complaint.

13. With respect to Paragraph 13 of Plaintiffs' Complaint, Plaintiffs' allegation regarding the Court's personal jurisdiction is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the law regarding personal jurisdiction speaks for itself. Defendants deny the remaining allegations in Paragraph 13 of Plaintiffs' Complaint.

14. With respect to Paragraph 14 of Plaintiffs' Complaint, Plaintiffs' allegation regarding the Court's personal jurisdiction is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the law regarding personal jurisdiction speaks for itself. Defendants lack sufficient information to admit or deny the remaining allegations in Paragraph 14 of Plaintiffs' Complaint and therefore deny same.

15. Paragraph 15 of Plaintiffs' Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 15 of Plaintiffs' Complaint.

16. Paragraph 16 of Plaintiffs' Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 16 of Plaintiffs' Complaint.

17. Paragraph 17 of Plaintiffs' Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 17 of Plaintiffs' Complaint.

18. Paragraph 18 of Plaintiffs' Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 18 of Plaintiffs' Complaint.

### **PARTIES**

19. Defendants admit the allegations in Paragraph 19 of Plaintiffs' Complaint, upon information and belief.

20. Defendants lack sufficient information to admit or deny the allegations in Paragraph 20 of Plaintiffs' Complaint and therefore deny same.

21. Defendants lack sufficient information to admit or deny the allegations in Paragraph 21 of Plaintiffs' Complaint and therefore deny same.

22. Defendants lack sufficient information to admit or deny the allegations in Paragraph 22 of Plaintiffs' Complaint and therefore deny same.

23. Defendants lack sufficient information to admit or deny the allegations in Paragraph 23 of Plaintiffs' Complaint and therefore deny same.

24. Defendants lack sufficient information to admit or deny the allegations in Paragraph 24 of Plaintiffs' Complaint and therefore deny same.

25. Defendants lack sufficient information to admit or deny the allegations in Paragraph 25 of Plaintiffs' Complaint and therefore deny same.

26. Defendants lack sufficient information to admit or deny the allegations in Paragraph 26 of Plaintiffs' Complaint and therefore deny same.

27. Defendants lack sufficient information to admit or deny the allegations in Paragraph 27 of Plaintiffs' Complaint and therefore deny same.

28. Defendants lack sufficient information to admit or deny the allegations in Paragraph 28 of Plaintiffs' Complaint and therefore deny same.

29. Defendants lack sufficient information to admit or deny the allegations in Paragraph 29 of Plaintiffs' Complaint and therefore deny same.

30. Paragraph 30 of Plaintiffs' Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the cited jurisdictional provisions speak for themselves.

31. Defendants lack sufficient information to admit or deny the allegations in Paragraph 31 of Plaintiffs' Complaint and therefore deny same.

32. Defendants lack sufficient information to admit or deny the allegations in Paragraph 32 of Plaintiffs' Complaint and therefore deny same.

33. Defendants lack sufficient information to admit or deny the allegations in Paragraph 33 of Plaintiffs' Complaint and therefore deny same.

34. Defendants lack sufficient information to admit or deny the allegations in Paragraph 34 of Plaintiffs' Complaint and therefore deny same.

35. Defendants lack sufficient information to admit or deny the allegations in Paragraph 35 of Plaintiffs' Complaint and therefore deny same.

36. Defendants lack sufficient information to admit or deny the allegations in Paragraph 36 of Plaintiffs' Complaint and therefore deny same.

37. Defendants lack sufficient information to admit or deny the allegations in Paragraph 37 of Plaintiffs' Complaint and therefore deny same.

38. Defendants lack sufficient information to admit or deny the allegations in Paragraph 38 of Plaintiffs' Complaint and therefore deny same.

39. Defendants lack sufficient information to admit or deny the allegations in Paragraph 39 of Plaintiffs' Complaint and therefore deny same.

40. Defendants lack sufficient information to admit or deny the allegations in Paragraph 40 of Plaintiffs' Complaint and therefore deny same.

41. Defendants lack sufficient information to admit or deny the allegations in Paragraph 41 of Plaintiffs' Complaint and therefore deny same.

42. Defendants lack sufficient information to admit or deny the allegations in Paragraph 42 of Plaintiffs' Complaint and therefore deny same.

43. Defendants lack sufficient information to admit or deny the allegations in Paragraph 43 of Plaintiffs' Complaint and therefore deny same.

44. Defendants lack sufficient information to admit or deny the allegations in Paragraph 44 of Plaintiffs' Complaint and therefore deny same.

45. Defendants lack sufficient information to admit or deny the allegations in Paragraph 45 of Plaintiffs' Complaint and therefore deny same.

46. Defendants lack sufficient information to admit or deny the allegations in Paragraph 46 of Plaintiffs' Complaint and therefore deny same.

47. Defendants lack sufficient information to admit or deny the allegations in Paragraph 47 of Plaintiffs' Complaint and therefore deny same.

48. Defendants lack sufficient information to admit or deny the allegations in Paragraph 48 of Plaintiffs' Complaint and therefore deny same.

49. Defendants lack sufficient information to admit or deny the allegations in Paragraph 49 of Plaintiffs' Complaint and therefore deny same.

50. Defendants lack sufficient information to admit or deny the allegations in Paragraph 50 of Plaintiffs' Complaint and therefore deny same.

51. Paragraph 51 of Plaintiffs' Complaint contains an informational statement for the reader, to which no response is required. To the extent a response is required, Defendants state that the information provided in Paragraph 51 of Plaintiffs' Complaint speaks for itself.

52. Paragraph 52 of Plaintiffs' Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the law regarding employer status speaks for itself.



53. Defendants lack sufficient information to admit or deny the allegations in Paragraph 53 of Plaintiffs' Complaint and therefore deny same.

54. Defendants lack sufficient information to admit or deny the allegations in Paragraph 54 of Plaintiffs' Complaint and therefore deny same.

55. Defendants lack sufficient information to admit or deny the allegations in Paragraph 55 of Plaintiffs' Complaint and therefore deny same.

56. Defendants lack sufficient information to admit or deny the allegations in Paragraph 56 of Plaintiffs' Complaint and therefore deny same.

57. Paragraph 57 of Plaintiffs' Complaint contains an informational statement for the reader, to which no response is required. To the extent a response is required, Defendants state that the information provided in Paragraph 57 of Plaintiffs' Complaint speaks for itself.

58. Defendants lack sufficient information to admit or deny the allegations in Paragraph 58 of Plaintiffs' Complaint and therefore deny same.

59. Defendants lack sufficient information to admit or deny the allegations in Paragraph 59 of Plaintiffs' Complaint and therefore deny same.

60. Defendants lack sufficient information to admit or deny the allegations in Paragraph 60 of Plaintiffs' Complaint and therefore deny same.

61. Defendants lack sufficient information to admit or deny the allegations in Paragraph 61 of Plaintiffs' Complaint and therefore deny same.

62. Defendants lack sufficient information to admit or deny the allegations in Paragraph 62 of Plaintiffs' Complaint and therefore deny same.

63. Defendants lack sufficient information to admit or deny the allegations in Paragraph 63 of Plaintiffs' Complaint and therefore deny same.

64. Defendants lack sufficient information to admit or deny the allegations in Paragraph 64 of Plaintiffs' Complaint and therefore deny same.

65. Defendants admit the allegations in Paragraph 65 of Plaintiffs' Complaint.

66. Defendants admit the allegations in Paragraph 66 of Plaintiffs' Complaint.

67. Defendants admit the allegations in Paragraph 67 of Plaintiffs' Complaint.

68. Defendants admit the allegations in Paragraph 68 of Plaintiffs' Complaint.

69. Defendants admit the allegations in Paragraph 69 of Plaintiffs' Complaint.

70. Defendants admit the allegations in Paragraph 70 of Plaintiffs' Complaint.

71. Defendants admit the allegations in Paragraph 71 of Plaintiffs' Complaint.

72. Defendants admit the allegations in Paragraph 72 of Plaintiffs' Complaint.

73. Defendants deny the allegations in Paragraph 73 of Plaintiffs' Complaint.

74. Defendants deny the allegations in Paragraph 74 of Plaintiffs' Complaint.

75. Defendants deny the allegations in Paragraph 75 of Plaintiffs' Complaint.

76. Defendants deny the allegations in Paragraph 76 of Plaintiffs' Complaint.

77. Defendants lack sufficient information to admit or deny the allegations in Paragraph 77 of Plaintiffs' Complaint and therefore deny same.

78. Defendants lack sufficient information to admit or deny the allegations in Paragraph 78 of Plaintiffs' Complaint and therefore deny same.

79. Paragraph 79 of Plaintiffs' Complaint contains an informational statement for the reader, to which no response is required. To the extent a response is required,

Defendants state that the information provided in Paragraph 79 of Plaintiffs' Complaint speaks for itself.

### **STATEMENT OF ALLEGED FACTS**

#### **Defendants and Related Companies**

80. Defendants admit the allegations in Paragraph 80 of Plaintiffs' Complaint, upon information and belief.

81. Defendants lack sufficient information to admit or deny the allegations in Paragraph 81 of Plaintiffs' Complaint and therefore deny same.

82. Defendants lack sufficient information to admit or deny the allegations in Paragraph 82 of Plaintiffs' Complaint and therefore deny same.

83. Defendants lack sufficient information to admit or deny the allegations in Paragraph 83 of Plaintiffs' Complaint and therefore deny same.

84. Defendants lack sufficient information to admit or deny the allegations in Paragraph 84 of Plaintiffs' Complaint and therefore deny same.

85. Defendants lack sufficient information to admit or deny the allegations in Paragraph 85 of Plaintiffs' Complaint and therefore deny same.

86. Defendants admit the allegations in Paragraph 86 of Plaintiffs' Complaint.

87. Defendants admit the allegations in Paragraph 87 of Plaintiffs' Complaint.

88. Defendants admit the allegations in Paragraph 88 of Plaintiffs' Complaint.

89. Defendants lack sufficient information to admit or deny the allegations in Paragraph 89 of Plaintiffs' Complaint and therefore deny same.

90. Defendants lack sufficient information to admit or deny the allegations in Paragraph 90 of Plaintiffs' Complaint and therefore deny same.

91. Defendants lack sufficient information to admit or deny the allegations in Paragraph 91 of Plaintiffs' Complaint and therefore deny same.

92. Defendants lack sufficient information to admit or deny the allegations in Paragraph 92 of Plaintiffs' Complaint and therefore deny same.

93. Defendants lack sufficient information to admit or deny the allegations in Paragraph 93 of Plaintiffs' Complaint and therefore deny same.

94. Defendants lack sufficient information to admit or deny the allegations in Paragraph 94 of Plaintiffs' Complaint and therefore deny same.

95. Defendants lack sufficient information to admit or deny the allegations in Paragraph 95 of Plaintiffs' Complaint and therefore deny same.

96. Defendants admit the allegations in Paragraph 96 of Plaintiffs' Complaint.

**Alleged Fraudulent H-2B Applications and Recruitment of Mexican Workers**

97. Defendants admit the allegations in Paragraph 97 of Plaintiffs' Complaint, upon information and belief.

98. Paragraph 98 of Plaintiffs' Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the cited legal provisions speak for themselves.

99. Defendants admit the allegation in Paragraph 99 of Plaintiffs' Complaint.

100. Paragraph 100 of Plaintiffs' Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the cited legal provisions speak for themselves.

101. Paragraph 101 of Plaintiffs' Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the cited legal provisions and DOL requirements speak for themselves.

102. Paragraph 102 of Plaintiffs' Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the cited legal provisions speak for themselves.

103. Paragraph 103 of Plaintiffs' Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the cited legal requirements regarding the Form ETA 9142B speak for themselves.

104. Paragraph 104 of Plaintiffs' Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the cited legal requirements regarding the Form ETA 9142B speak for themselves.

105. Defendants admit Paragraph 105 of Plaintiffs' Complaint. Defendants further state that Exhibit J of Plaintiffs' Complaint speaks for itself.

106. Paragraph 106 of Plaintiffs' Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 106 of Plaintiffs' Complaint.

107. With respect to Paragraph 107 of Plaintiffs' Complaint, Defendants state that the ETA Form 9141 (Exhibit J to Plaintiffs' Complaint) speaks for itself.

108. With respect to Paragraph 108 of Plaintiffs' Complaint, Defendants state that the ETA Form 9141 (Exhibit J to Plaintiffs' Complaint) speaks for itself.

109. With respect to Paragraph 109 of Plaintiffs' Complaint, Defendants state that the ETA Form 9141 (Exhibit J to Plaintiffs' Complaint) speaks for itself.

110. With respect to Paragraph 110 of Plaintiffs' Complaint, Defendants state that the ETA Form 9141 (Exhibit J to Plaintiffs' Complaint) speaks for itself.

111. With respect to Paragraph 111 of Plaintiffs' Complaint, Defendants state that the ETA Form 9141 (Exhibit J to Plaintiffs' Complaint) speaks for itself.

112. With respect to Paragraph 112 of Plaintiffs' Complaint, Defendants state that the ETA Form 9141 (Exhibit J to Plaintiffs' Complaint) speaks for itself, including the SOC occupation description.

113. With respect to Paragraph 113 of Plaintiffs' Complaint, Defendants state that the ETA Form 9141 (Exhibit J to Plaintiffs' Complaint) speaks for itself, including the SOC occupation description.

114. With respect to Paragraph 114 of Plaintiffs' Complaint, Defendants state that the ETA Form 9141 (Exhibit J to Plaintiffs' Complaint) speaks for itself, including the worksite listed on said Form.

115. With respect to Paragraph 115 of Plaintiffs' Complaint, Defendants state that the ETA Form 9141 (Exhibit J to Plaintiffs' Complaint) speaks for itself, including the list of anticipated worksites.

116. With respect to Paragraph 116 of Plaintiffs' Complaint, Defendants state that the ETA Form 9141 (Exhibit J to Plaintiffs' Complaint) speaks for itself, including the case number provided.

117. With respect to Paragraph 117 of Plaintiffs' Complaint, Defendants state that the ETA Form 9141 (Exhibit J to Plaintiffs' Complaint) speaks for itself, including the prevailing wage determination.

118. With respect to Paragraph 118 of Plaintiffs' Complaint, Defendants state that the ETA Form 9142B speaks for itself, including the date of submission of said form.

119. Paragraph 119 of Plaintiffs' Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 119 of Plaintiffs' Complaint.

120. With respect to Paragraph 120 of Plaintiffs' Complaint, Defendants state that the subject documents speak for themselves, including the job title listed on said documents.

121. With respect to Paragraph 121 of Plaintiffs' Complaint, Defendants state that the subject documents speak for themselves, including the SOC code.

122. With respect to Paragraph 122 of Plaintiffs' Complaint, Defendants state that the subject documents speak for themselves, including the listed SOC occupation.

123. With respect to Paragraph 123 of Plaintiffs' Complaint, Defendants state that the subject documents speak for themselves, including the listed position status.

124. With respect to Paragraph 124 of Plaintiffs' Complaint, Defendants state that the subject documents speak for themselves, including the position start date.

125. With respect to Paragraph 125 of Plaintiffs' Complaint, Defendants state that the subject documents speak for themselves, including the position end date.

126. With respect to Paragraph 126 of Plaintiffs' Complaint, Defendants state that the subject documents speak for themselves, including the representations made to the DOL regarding months of operation per calendar year.

127. Defendants lack sufficient information to admit or deny the allegations in Paragraph 127 of Plaintiffs' Complaint and therefore deny same.

128. With respect to Paragraph 128 of Plaintiffs' Complaint, Defendants state that the subject documents speak for themselves, including the number of worker positions requested for certification.

129. With respect to Paragraph 129 of Plaintiffs' Complaint, Defendants state that the subject documents speak for themselves, including the legal business name for the employer appearing on the labor certification.

130. With respect to Paragraph 130 of Plaintiffs' Complaint, Defendants state that the subject documents speak for themselves, including the trade name and/or labor "dba" appearing on said documents.

131. With respect to Paragraph 131 of Plaintiffs' Complaint, Defendants state that the subject documents speak for themselves, including the individual identified as owner and/or point of contact on said documents.

132. With respect to Paragraph 132 of Plaintiffs' Complaint, Defendants state that the subject documents speak for themselves, including the anticipated hours worked per week indicated on said documents.



133. With respect to Paragraph 133 of Plaintiffs' Complaint, Defendants state that the subject documents speak for themselves, including the proposed work schedule indicated on said documents.

134. With respect to Paragraph 134 of Plaintiffs' Complaint, Defendants state that the subject documents speak for themselves, including the referenced pay and salary information.

135. With respect to Paragraph 135 of Plaintiffs' Complaint, Defendants state that the subject documents speak for themselves, including the referenced wage calculation (40 hours per week x \$9.68). Defendants lack sufficient information to directly admit or deny Defendant Midwest's representations, and therefore deny same.

136. With respect to Paragraph 136 of Plaintiffs' Complaint, Defendants state that the subject documents speak for themselves.

137. With respect to Paragraph 137 of Plaintiffs' Complaint, Defendants state that the subject documents speak for themselves.

138. With respect to Paragraph 138 of Plaintiffs' Complaint, Defendants state that the subject documents speak for themselves, including the case number assigned.

139. With respect to Paragraph 139 of Plaintiffs' Complaint, Defendants state that the subject documents speak for themselves, including the date of the DOL's certification for twenty-eight temporary workers.

140. With respect to Paragraph 140 of Plaintiffs' Complaint, Defendants state that the subject documents speak for themselves, including Defendant Midwest's representations.

141. Defendants lack sufficient information to admit or deny the allegations in Paragraph 141 of Plaintiffs' Complaint and therefore deny same.

142. Defendants admit the allegations in Paragraph 142 of Plaintiffs' Complaint, upon information and belief.

143. Paragraph 143 of Plaintiffs' Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants deny the allegation in Paragraph 143 of Plaintiffs' Complaint. Further answering, Defendants state that the subject visa petitions speak for themselves.

144. Defendants lack sufficient information to admit or deny the allegations in Paragraph 144 of Plaintiffs' Complaint and therefore deny same. Further answering, Defendants state that the subject visa petitions speak for themselves.

145. Defendants lack sufficient information to admit or deny the allegations in Paragraph 145 of Plaintiffs' Complaint and therefore deny same, except state upon information and belief that the subject visa petitions were approved.

146. Paragraph 146 of Plaintiffs' Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants deny the allegation in Paragraph 146 of Plaintiffs' Complaint. Further answering, Defendants state that the subject visa petitions speak for themselves.

147. With respect to Paragraph 147 of Plaintiffs' Complaint, Defendants state that the subject documents speak for themselves, including the number of workers for which Crescent City petitioned. Defendants admit the remaining allegations in Paragraph 147 of Plaintiffs' Complaint, upon information and belief.

148. With respect to Paragraph 148 of Plaintiffs' Complaint, Defendants state that the subject documents speak for themselves, including the number of workers for which Shamrock petitioned. Defendants admit the remaining allegations in Paragraph 148 of Plaintiffs' Complaint, upon information and belief.

149. Defendants admit the allegations in Paragraph 149 of Plaintiffs' Complaint.

150. Defendants admit the allegations in Paragraph 150 of Plaintiffs' Complaint.

151. Defendants deny the allegations in Paragraph 151 of Plaintiffs' Complaint.

152. Defendants deny the allegations in Paragraph 152 of Plaintiffs' Complaint.

153. Defendants admit the allegations in Paragraph 153 of Plaintiffs' Complaint.

154. Defendants admit the allegations in Paragraph 154 of Plaintiffs' Complaint.

155. Defendants deny the allegations in Paragraph 155 of Plaintiffs' Complaint, except state that individuals seeking a visa were required to pay the requisite Application Service Center fee in addition to covering other expenses, and individuals seeking a visa were told to meet in Matamoros.

156. Defendants lack sufficient information to admit or deny the allegations in Paragraph 156 of Plaintiffs' Complaint and therefore deny same, except state that individuals were required to cover various costs.

157. Defendants admit the allegations in Paragraph 157 of Plaintiffs' Complaint, and clarify that Defendant Alejandro Trevino was the only "agent."

158. Defendants lack sufficient information to admit or deny the allegation in Paragraph 158 of Plaintiffs' Complaint and therefore deny same.

159. Defendants deny the allegations in Paragraph 159 of Plaintiffs' Complaint.

160. Defendants deny the allegations in Paragraph 160 of Plaintiffs' Complaint.

161. Defendants lack sufficient information to admit or deny the allegations in Paragraph 161 of Plaintiffs' Complaint and therefore deny same.

162. Defendants lack sufficient information to admit or deny the allegations in Paragraph 162 of Plaintiffs' Complaint and therefore deny same.

163. Defendants lack sufficient information to admit or deny the allegations in Paragraph 163 of Plaintiffs' Complaint and therefore deny same.

164. Defendants admit the allegations in Paragraph 164 of Plaintiffs' Complaint.

165. Defendants admit the allegations in Paragraph 165 of Plaintiffs' Complaint.

166. Defendants deny the allegations in Paragraph 166 of Plaintiffs' Complaint, except state individuals seeking visas to lawfully work within the United States were provided with the pertinent information regarding their potential work in the United States.

167. Defendants deny the allegations in Paragraph 167 of Plaintiffs' Complaint.

168. Defendants deny the allegations in Paragraph 168 of Plaintiffs' Complaint.

169. Defendants deny the allegations in Paragraph 169 of Plaintiffs' Complaint

170. Defendants lack sufficient information to admit or deny the allegation in Paragraph 170 of Plaintiffs' Complaint and therefore deny same.

171. Defendants deny the allegations in Paragraph 171 of Plaintiffs' Complaint, except state that it submitted visa applications on behalf of said entities.

172. Defendants lack sufficient information to admit or deny the allegation in Paragraph 172 of Plaintiffs' Complaint and therefore deny same.

173. Defendants lack sufficient information to admit or deny the allegations in Paragraph 173 of Plaintiffs' Complaint and therefore deny same.

174. Defendants lack sufficient information to admit or deny the allegations in Paragraph 174 of Plaintiffs' Complaint and therefore deny same.

175. Defendants admit the allegation in Paragraph 175 of Plaintiffs' Complaint, upon information and belief.

176. Defendants admit the allegation in Paragraph 176 of Plaintiffs' Complaint.

177. Defendants admit the allegations in Paragraph 177 of Plaintiffs' Complaint.

178. Defendants lack sufficient information to admit or deny the allegations in Paragraph 178 of Plaintiffs' Complaint and therefore deny same.

179. Paragraph 179 of Plaintiffs' Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants lack sufficient information to admit or deny the allegations in Paragraph 179 of Plaintiffs' Complaint and therefore deny same.

180. Defendants deny the allegations in Paragraph 180 of Plaintiffs' Complaint, except state that the subject documents speak for themselves.

181. Paragraph 181 of Plaintiffs' Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants lack sufficient information to admit or deny the allegations in Paragraph 181 of Plaintiffs' Complaint and therefore deny same.

182. Paragraph 182 of Plaintiffs' Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants lack sufficient

information to admit or deny the allegations in Paragraph 182 of Plaintiffs' Complaint and therefore deny same.

**The Alleged February Arrivals: Plaintiffs Ramiro Gonzalez Juarez  
and Jahir Alfonso Vergara Maza**

183. Defendants lack sufficient information to admit or deny the allegations in Paragraph 183 of Plaintiffs' Complaint and therefore deny same.

184. With respect to Paragraph 184 of Plaintiffs' Complaint, Defendants state that the subject H-2B visa speaks for itself.

185. With respect to Paragraph 185 of Plaintiffs' Complaint, Defendants state that the subject H-2B visa speaks for itself.

186. With respect to Paragraph 186 of Plaintiffs' Complaint, Defendants state that the subject H-2B visa speaks for itself. Defendants deny the remaining allegations in Paragraph 186 of Plaintiffs' Complaint.

187. Defendants lack sufficient information to admit or deny the allegations in Paragraph 187 of Plaintiffs' Complaint and therefore deny same.

188. Defendants lack sufficient information to admit or deny the allegations in Paragraph 188 of Plaintiffs' Complaint and therefore deny same.

189. Defendants lack sufficient information to admit or deny the allegations in Paragraph 189 of Plaintiffs' Complaint and therefore deny same.

190. Defendants deny the allegations in Paragraph 190 of Plaintiffs' Complaint.

191. Defendants deny the allegations in Paragraph 191 of Plaintiffs' Complaint, except state that individuals seeking work in the United States through Defendant ATJ paid for lodging, travel, and the fee associated with the Application Service Center.

192. Defendants deny the allegations in Paragraph 192 of Plaintiffs' Complaint.

193. Defendants lack sufficient information to admit or deny the allegations in Paragraph 193 of Plaintiffs' Complaint and therefore deny same.

194. Defendants lack sufficient information to admit or deny the allegations in Paragraph 194 of Plaintiffs' Complaint and therefore deny same.

195. Defendants lack sufficient information to admit or deny the allegations in Paragraph 195 of Plaintiffs' Complaint and therefore deny same.

196. Defendants lack sufficient information to admit or deny the allegations in Paragraph 196 of Plaintiffs' Complaint and therefore deny same.

197. Defendants lack sufficient information to admit or deny the allegations in Paragraph 197 of Plaintiffs' Complaint and therefore deny same.

198. Defendants lack sufficient information to admit or deny the allegations in Paragraph 198 of Plaintiffs' Complaint and therefore deny same.

199. Defendants lack sufficient information to admit or deny the allegations in Paragraph 199 of Plaintiffs' Complaint and therefore deny same.

200. Defendants lack sufficient information to admit or deny the allegations in Paragraph 200 of Plaintiffs' Complaint and therefore deny same.

201. Defendants lack sufficient information to admit or deny the allegations in Paragraph 201 of Plaintiffs' Complaint and therefore deny same.

202. Defendants lack sufficient information to admit or deny the allegations in Paragraph 202 of Plaintiffs' Complaint and therefore deny same.

203. Defendants lack sufficient information to admit or deny the allegations in Paragraph 203 of Plaintiffs' Complaint and therefore deny same.

204. Defendants lack sufficient information to admit or deny the allegations in Paragraph 204 of Plaintiffs' Complaint and therefore deny same.

205. Defendants lack sufficient information to admit or deny the allegations in Paragraph 205 of Plaintiffs' Complaint and therefore deny same.

206. Defendants lack sufficient information to admit or deny the allegations in Paragraph 206 of Plaintiffs' Complaint and therefore deny same.

207. Defendants lack sufficient information to admit or deny the allegations in Paragraph 207 of Plaintiffs' Complaint and therefore deny same.

208. Defendants lack sufficient information to admit or deny the allegations in Paragraph 208 of Plaintiffs' Complaint and therefore deny same.

209. Defendants lack sufficient information to admit or deny the allegations in Paragraph 209 of Plaintiffs' Complaint and therefore deny same.

210. Defendants lack sufficient information to admit or deny the allegations in Paragraph 210 of Plaintiffs' Complaint and therefore deny same.

**The Alleged April Arrivals: Plaintiffs Maria del Carmen Mendez Castro, Sara Mendez Castro, and Roberto Antonio Cuamba Razo**

211. Defendants lack sufficient information to admit or deny the allegations in Paragraph 211 of Plaintiffs' Complaint and therefore deny same.



212. Defendants admit the allegation in Paragraph 212 of Plaintiffs' Complaint, upon information and belief. Further answering, Defendants state that the cited H-2B visa speaks for itself.

213. With respect to Paragraph 213 of Plaintiffs' Complaint, Defendants state that the cited H-2B visa speaks for itself.

214. Defendants lack sufficient information to admit or deny the allegations in Paragraph 214 of Plaintiffs' Complaint and therefore deny same. Further answering, Defendants state that the cited H-2B visa and petition speak for themselves.

215. Defendants lack sufficient information to admit or deny the allegations in Paragraph 215 of Plaintiffs' Complaint and therefore deny same.

216. Defendants lack sufficient information to admit or deny the allegations in Paragraph 216 of Plaintiffs' Complaint and therefore deny same.

217. Defendants deny the allegation in Paragraph 217 of Plaintiffs' Complaint.

218. Defendants deny the allegation in Paragraph 218 of Plaintiffs' Complaint, upon information and belief.

219. Defendants deny the allegation in Paragraph 219 of Plaintiffs' Complaint.

220. Defendants lack sufficient information to admit or deny the allegations in Paragraph 220 of Plaintiffs' Complaint and therefore deny same.

221. Defendants lack sufficient information to admit or deny the allegations in Paragraph 221 of Plaintiffs' Complaint and therefore deny same.

222. Defendants lack sufficient information to admit or deny the allegations in Paragraph 222 of Plaintiffs' Complaint and therefore deny same.

223. Defendants lack sufficient information to admit or deny the allegations in Paragraph 223 of Plaintiffs' Complaint and therefore deny same.

224. Defendants lack sufficient information to admit or deny the allegations in Paragraph 224 of Plaintiffs' Complaint and therefore deny same.

225. Paragraph 225 of Plaintiffs' Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants state that the SOC codes speaks for themselves.

226. Defendants lack sufficient information to admit or deny the allegations in Paragraph 226 of Plaintiffs' Complaint and therefore deny same.

227. Defendants lack sufficient information to admit or deny the allegations in Paragraph 227 of Plaintiffs' Complaint and therefore deny same.

228. Defendants lack sufficient information to admit or deny the allegations in Paragraph 228 of Plaintiffs' Complaint and therefore deny same.

229. Defendants lack sufficient information to admit or deny the allegations in Paragraph 229 of Plaintiffs' Complaint and therefore deny same.

230. Defendants lack sufficient information to admit or deny the allegations in Paragraph 230 of Plaintiffs' Complaint and therefore deny same.

231. Defendants lack sufficient information to admit or deny the allegations in Paragraph 231 of Plaintiffs' Complaint and therefore deny same.

232. Defendants lack sufficient information to admit or deny the allegations in Paragraph 232 of Plaintiffs' Complaint and therefore deny same.

233. Defendants admit the allegation in Paragraph 233 of Plaintiffs' Complaint, upon information and belief. Further answering, Defendants state that the cited H-2B visa speaks for itself.

234. With respect to Paragraph 234 of Plaintiffs' Complaint, Defendants state that the cited H-2B visa speaks for itself.

235. Defendants lack sufficient information to admit or deny the allegations in Paragraph 235 of Plaintiffs' Complaint and therefore deny same. Further answering, Defendants state that the cited H-2B visa and petition speak for themselves.

236. Defendants lack sufficient information to admit or deny the allegations in Paragraph 236 of Plaintiffs' Complaint and therefore deny same.

237. Defendants lack sufficient information to admit or deny the allegations in Paragraph 237 of Plaintiffs' Complaint and therefore deny same.

238. Defendants deny the allegations in Paragraph 238 of Plaintiffs' Complaint.

239. Defendants deny the allegations in Paragraph 239 of Plaintiffs' Complaint, upon information and belief.

240. Defendants deny the allegations in Paragraph 240 of Plaintiffs' Complaint.

241. Defendants lack sufficient information to admit or deny the allegations in Paragraph 241 of Plaintiffs' Complaint and therefore deny same.

242. Defendants lack sufficient information to admit or deny the allegations in Paragraph 242 of Plaintiffs' Complaint and therefore deny same.

243. Defendants lack sufficient information to admit or deny the allegations in Paragraph 243 of Plaintiffs' Complaint and therefore deny same.

244. Defendants lack sufficient information to admit or deny the allegations in Paragraph 244 of Plaintiffs' Complaint and therefore deny same.

245. Defendants lack sufficient information to admit or deny the allegations in Paragraph 245 of Plaintiffs' Complaint and therefore deny same.

246. Defendants lack sufficient information to admit or deny the allegations in Paragraph 246 of Plaintiffs' Complaint and therefore deny same.

247. Defendants lack sufficient information to admit or deny the allegations in Paragraph 247 of Plaintiffs' Complaint and therefore deny same.

248. Defendants lack sufficient information to admit or deny the allegations in Paragraph 248 of Plaintiffs' Complaint and therefore deny same.

249. Defendants admit the allegation in Paragraph 249 of Plaintiffs' Complaint. Further answering, Defendants state that the cited H-2B visa speaks for itself.

250. With respect to Paragraph 250 of Plaintiffs' Complaint, Defendants state that the cited H-2B visa speaks for itself.

251. Defendants lack sufficient information to admit or deny the allegations in Paragraph 251 of Plaintiffs' Complaint and therefore deny same. Further answering, Defendants state that the cited H-2B visa and petition speak for themselves.

252. Defendants lack sufficient information to admit or deny the allegations in Paragraph 252 of Plaintiffs' Complaint and therefore deny same.

253. Defendants deny the allegation in Paragraph 253 of Plaintiffs' Complaint.

254. Defendants lack sufficient information to admit or deny the allegations in Paragraph 254 of Plaintiffs' Complaint and therefore deny same.

255. Defendants lack sufficient information to admit or deny the allegations in Paragraph 255 of Plaintiffs' Complaint and therefore deny same.

256. Defendants deny the allegations in Paragraph 256 of Plaintiffs' Complaint.

257. Defendants lack sufficient information to admit or deny the allegations in Paragraph 257 of Plaintiffs' Complaint and therefore deny same.

258. Defendants lack sufficient information to admit or deny the allegations in Paragraph 258 of Plaintiffs' Complaint and therefore deny same.

259. Defendants lack sufficient information to admit or deny the allegations in Paragraph 259 of Plaintiffs' Complaint and therefore deny same.

**The Alleged May Arrival: Plaintiff Marco Antonio Olivares Perez**

260. Defendants lack sufficient information to admit or deny the allegations in Paragraph 260 of Plaintiffs' Complaint and therefore deny same.

261. Defendants admit the allegation in Paragraph 261 of Plaintiffs' Complaint, upon information and belief. Further answering, Defendants state that the cited H-2B visa speaks for itself.

262. With respect to Paragraph 262 of Plaintiffs' Complaint, Defendants state that the cited H-2B visa speaks for itself.

263. Defendants lack sufficient information to admit or deny the allegations in Paragraph 263 of Plaintiffs' Complaint and therefore deny same. Further answering, Defendants state that the cited H-2B visa and petition speak for themselves.

264. Defendants lack sufficient information to admit or deny the allegations in Paragraph 264 of Plaintiffs' Complaint and therefore deny same, except Defendants expressly deny that Salvador Mendoza was an agent of Defendant ATJ.

265. Defendants lack sufficient information to admit or deny the allegations in Paragraph 265 of Plaintiffs' Complaint and therefore deny same.

266. Defendants lack sufficient information to admit or deny the allegations in Paragraph 266 of Plaintiffs' Complaint and therefore deny same.

267. Defendants lack sufficient information to admit or deny the allegations in Paragraph 267 of Plaintiffs' Complaint and therefore deny same.

268. Defendants deny the allegation in Paragraph 268 of Plaintiffs' Complaint.

269. Defendants lack sufficient information to admit or deny the allegations in Paragraph 269 of Plaintiffs' Complaint and therefore deny same.

270. Defendants lack sufficient information to admit or deny the allegations in Paragraph 270 of Plaintiffs' Complaint and therefore deny same.

271. Defendants lack sufficient information to admit or deny the allegations in Paragraph 271 of Plaintiffs' Complaint and therefore deny same.

272. Defendants lack sufficient information to admit or deny the allegations in Paragraph 272 of Plaintiffs' Complaint and therefore deny same.

273. With respect to Paragraph 273 of Plaintiffs' Complaint, Defendants state that the referenced visas speak for themselves.

274. Defendants lack sufficient information to admit or deny the allegations in Paragraph 274 of Plaintiffs' Complaint and therefore deny same.

275. Defendants lack sufficient information to admit or deny the allegations in Paragraph 275 of Plaintiffs' Complaint and therefore deny same.

276. Defendants lack sufficient information to admit or deny the allegations in Paragraph 276 of Plaintiffs' Complaint and therefore deny same.

277. Defendants lack sufficient information to admit or deny the allegations in Paragraph 277 of Plaintiffs' Complaint and therefore deny same.

278. Defendants lack sufficient information to admit or deny the allegations in Paragraph 278 of Plaintiffs' Complaint and therefore deny same.

279. Defendants deny the allegations in Paragraph 279 of Plaintiffs' Complaint.

280. Defendants deny the allegations in Paragraph 280 of Plaintiffs' Complaint, upon information and belief.

281. Defendants deny the allegation in Paragraph 281 of Plaintiffs' Complaint.

282. Defendants lack sufficient information to admit or deny the allegations in Paragraph 282 of Plaintiffs' Complaint and therefore deny same.

283. Defendants lack sufficient information to admit or deny the allegations in Paragraph 283 of Plaintiffs' Complaint and therefore deny same.

284. Defendants lack sufficient information to admit or deny the allegations in Paragraph 284 of Plaintiffs' Complaint and therefore deny same.

285. Defendants lack sufficient information to admit or deny the allegations in Paragraph 285 of Plaintiffs' Complaint and therefore deny same.

286. Defendants lack sufficient information to admit or deny the allegations in Paragraph 286 of Plaintiffs' Complaint and therefore deny same.

287. Defendants lack sufficient information to admit or deny the allegations in Paragraph 287 of Plaintiffs' Complaint and therefore deny same.

**Defendant Midwest's Alleged Failure to Pay Wages**

288. Defendants lack sufficient information to admit or deny the allegations in Paragraph 288 of Plaintiffs' Complaint and therefore deny same.

289. Defendants lack sufficient information to admit or deny the allegations in Paragraph 289 of Plaintiffs' Complaint and therefore deny same.

290. Defendants lack sufficient information to admit or deny the allegations in Paragraph 290 of Plaintiffs' Complaint and therefore deny same.

291. Defendants lack sufficient information to admit or deny the allegations in Paragraph 291 of Plaintiffs' Complaint and therefore deny same.

292. Defendants lack sufficient information to admit or deny the allegations in Paragraph 292 of Plaintiffs' Complaint and therefore deny same.

293. Defendants lack sufficient information to admit or deny the allegations in Paragraph 293 of Plaintiffs' Complaint and therefore deny same.

294. Defendants lack sufficient information to admit or deny the allegations in Paragraph 294 of Plaintiffs' Complaint and therefore deny same.

295. Defendants lack sufficient information to admit or deny the allegations in Paragraph 295 of Plaintiffs' Complaint and therefore deny same.

296. Defendants lack sufficient information to admit or deny the allegations in Paragraph 296 of Plaintiffs' Complaint and therefore deny same.



297. Defendants lack sufficient information to admit or deny the allegations in Paragraph 297 of Plaintiffs' Complaint and therefore deny same.

298. Defendants lack sufficient information to admit or deny the allegations in Paragraph 298 of Plaintiffs' Complaint and therefore deny same.

299. Defendants lack sufficient information to admit or deny the allegations in Paragraph 299 of Plaintiffs' Complaint and therefore deny same.

300. Defendants lack sufficient information to admit or deny the allegations in Paragraph 300 of Plaintiffs' Complaint and therefore deny same.

301. Defendants lack sufficient information to admit or deny the allegations in Paragraph 301 of Plaintiffs' Complaint and therefore deny same.

302. Defendants lack sufficient information to admit or deny the allegations in Paragraph 302 of Plaintiffs' Complaint and therefore deny same.

303. Defendants lack sufficient information to admit or deny the allegations in Paragraph 303 of Plaintiffs' Complaint and therefore deny same.

304. Defendants lack sufficient information to admit or deny the allegations in Paragraph 304 of Plaintiffs' Complaint and therefore deny same.

305. Defendants lack sufficient information to admit or deny the allegations in Paragraph 305 of Plaintiffs' Complaint and therefore deny same.

306. Defendants lack sufficient information to admit or deny the allegations in Paragraph 306 of Plaintiffs' Complaint and therefore deny same.

307. Defendants lack sufficient information to admit or deny the allegations in Paragraph 307 of Plaintiffs' Complaint and therefore deny same.

308. Defendants lack sufficient information to admit or deny the allegations in Paragraph 308 of Plaintiffs' Complaint and therefore deny same.

309. Defendants lack sufficient information to admit or deny the allegations in Paragraph 309 of Plaintiffs' Complaint and therefore deny same.

310. Defendants lack sufficient information to admit or deny the allegations in Paragraph 310 of Plaintiffs' Complaint and therefore deny same.

311. Defendants lack sufficient information to admit or deny the allegations in Paragraph 311 of Plaintiffs' Complaint and therefore deny same.

312. Defendants lack sufficient information to admit or deny the allegations in Paragraph 312 of Plaintiffs' Complaint and therefore deny same.

313. Defendants lack sufficient information to admit or deny the allegations in Paragraph 313 of Plaintiffs' Complaint and therefore deny same.

314. Defendants lack sufficient information to admit or deny the allegations in Paragraph 314 of Plaintiffs' Complaint and therefore deny same.

**Plaintiffs' Allegations That They Suffered Abusive Treatment and Working Conditions**

315. Defendants lack sufficient information to admit or deny the allegations in Paragraph 315 of Plaintiffs' Complaint and therefore deny same.

316. Defendants lack sufficient information to admit or deny the allegations in Paragraph 316 of Plaintiffs' Complaint and therefore deny same.

317. Defendants lack sufficient information to admit or deny the allegations in Paragraph 317 of Plaintiffs' Complaint and therefore deny same.

318. Defendants lack sufficient information to admit or deny the allegations in Paragraph 318 of Plaintiffs' Complaint and therefore deny same.

319. Defendants lack sufficient information to admit or deny the allegations in Paragraph 319 of Plaintiffs' Complaint and therefore deny same.

320. Defendants lack sufficient information to admit or deny the allegations in Paragraph 320 of Plaintiffs' Complaint and therefore deny same.

321. Defendants lack sufficient information to admit or deny the allegations in Paragraph 321 of Plaintiffs' Complaint and therefore deny same.

322. Defendants lack sufficient information to admit or deny the allegations in Paragraph 322 of Plaintiffs' Complaint and therefore deny same.

323. Defendants lack sufficient information to admit or deny the allegations in Paragraph 323 of Plaintiffs' Complaint and therefore deny same.

324. Defendants lack sufficient information to admit or deny the allegations in Paragraph 324 of Plaintiffs' Complaint and therefore deny same.

325. Defendants lack sufficient information to admit or deny the allegations in Paragraph 325 of Plaintiffs' Complaint and therefore deny same.

326. Defendants lack sufficient information to admit or deny the allegations in Paragraph 326 of Plaintiffs' Complaint and therefore deny same.

327. Defendants lack sufficient information to admit or deny the allegations in Paragraph 327 of Plaintiffs' Complaint and therefore deny same.

328. Defendants lack sufficient information to admit or deny the allegations in Paragraph 328 of Plaintiffs' Complaint and therefore deny same.

329. Paragraph 329 of Plaintiffs' Complaint is a legal conclusion to which no response is required. To the extent a response is required, Defendants lack sufficient information to admit or deny the allegations in Paragraph 329 of Plaintiffs' Complaint and therefore deny same.

330. Defendants lack sufficient information to admit or deny the allegations in Paragraph 330 of Plaintiffs' Complaint and therefore deny same.

331. Defendants lack sufficient information to admit or deny the allegations in Paragraph 331 of Plaintiffs' Complaint and therefore deny same.

332. Defendants lack sufficient information to admit or deny the allegations in Paragraph 332 of Plaintiffs' Complaint and therefore deny same.

333. Defendants lack sufficient information to admit or deny the allegations in Paragraph 333 of Plaintiffs' Complaint and therefore deny same.

334. Defendants lack sufficient information to admit or deny the allegations in Paragraph 334 of Plaintiffs' Complaint and therefore deny same.

335. Defendants lack sufficient information to admit or deny the allegations in Paragraph 335 of Plaintiffs' Complaint and therefore deny same.

336. Defendants lack sufficient information to admit or deny the allegations in Paragraph 336 of Plaintiffs' Complaint and therefore deny same.

337. Defendants lack sufficient information to admit or deny the allegations in Paragraph 337 of Plaintiffs' Complaint and therefore deny same.

338. Defendants lack sufficient information to admit or deny the allegations in Paragraph 338 of Plaintiffs' Complaint and therefore deny same.

339. Defendants lack sufficient information to admit or deny the allegations in Paragraph 339 of Plaintiffs' Complaint and therefore deny same.

340. Defendants lack sufficient information to admit or deny the allegations in Paragraph 340 of Plaintiffs' Complaint and therefore deny same.

341. Defendants lack sufficient information to admit or deny the allegations in Paragraph 341 of Plaintiffs' Complaint and therefore deny same.

342. Defendants lack sufficient information to admit or deny the allegations in Paragraph 342 of Plaintiffs' Complaint and therefore deny same.

343. Defendants lack sufficient information to admit or deny the allegations in Paragraph 343 of Plaintiffs' Complaint and therefore deny same.

344. Defendants lack sufficient information to admit or deny the allegations in Paragraph 344 of Plaintiffs' Complaint and therefore deny same.

345. Defendants lack sufficient information to admit or deny the allegations in Paragraph 345 of Plaintiffs' Complaint and therefore deny same.

346. Defendants lack sufficient information to admit or deny the allegations in Paragraph 346 of Plaintiffs' Complaint and therefore deny same.

347. Defendants lack sufficient information to admit or deny the allegations in Paragraph 347 of Plaintiffs' Complaint and therefore deny same.

348. Defendants lack sufficient information to admit or deny the allegations in Paragraph 348 of Plaintiffs' Complaint and therefore deny same.

349. Defendants lack sufficient information to admit or deny the allegations in Paragraph 349 of Plaintiffs' Complaint and therefore deny same.

350. Defendants lack sufficient information to admit or deny the allegations in Paragraph 350 of Plaintiffs' Complaint and therefore deny same.

351. Defendants lack sufficient information to admit or deny the allegations in Paragraph 351 of Plaintiffs' Complaint and therefore deny same.

352. Defendants lack sufficient information to admit or deny the allegations in Paragraph 352 of Plaintiffs' Complaint and therefore deny same.

353. Defendants lack sufficient information to admit or deny the allegations in Paragraph 353 of Plaintiffs' Complaint and therefore deny same.

354. Defendants lack sufficient information to admit or deny the allegations in Paragraph 354 of Plaintiffs' Complaint and therefore deny same.

355. Defendants lack sufficient information to admit or deny the allegations in Paragraph 355 of Plaintiffs' Complaint and therefore deny same.

356. Defendants lack sufficient information to admit or deny the allegations in Paragraph 356 of Plaintiffs' Complaint and therefore deny same.

357. Defendants lack sufficient information to admit or deny the allegations in Paragraph 357 of Plaintiffs' Complaint and therefore deny same.

358. Defendants lack sufficient information to admit or deny the allegations in Paragraph 358 of Plaintiffs' Complaint and therefore deny same.

359. Defendants lack sufficient information to admit or deny the allegations in Paragraph 359 of Plaintiffs' Complaint and therefore deny same.

360. With respect to Paragraph 360 of Plaintiffs' Complaint, Defendants state that the Spanish-to-English translation of the referenced words speaks for itself.

361. With respect to Paragraph 361 of Plaintiffs' Complaint, Defendants state that the Spanish-to-English translation of the referenced words speaks for itself.

362. Defendants lack sufficient information to admit or deny the allegations in Paragraph 362 of Plaintiffs' Complaint and therefore deny same.

363. With respect to Paragraph 363 of Plaintiffs' Complaint, Defendants state that the Spanish-to-English translation of the referenced words speaks for itself.

364. Defendants lack sufficient information to admit or deny the allegations in Paragraph 364 of Plaintiffs' Complaint and therefore deny same.

365. Defendants lack sufficient information to admit or deny the allegations in Paragraph 365 of Plaintiffs' Complaint and therefore deny same.

366. Defendants lack sufficient information to admit or deny the allegations in Paragraph 366 of Plaintiffs' Complaint and therefore deny same.

367. Defendants lack sufficient information to admit or deny the allegations in Paragraph 367 of Plaintiffs' Complaint and therefore deny same.

368. Defendants lack sufficient information to admit or deny the allegations in Paragraph 368 of Plaintiffs' Complaint and therefore deny same.

369. Defendants lack sufficient information to admit or deny the allegations in Paragraph 369 of Plaintiffs' Complaint and therefore deny same.

370. Defendants lack sufficient information to admit or deny the allegations in Paragraph 370 of Plaintiffs' Complaint and therefore deny same.

371. Defendants lack sufficient information to admit or deny the allegations in Paragraph 371 of Plaintiffs' Complaint and therefore deny same.

372. Defendants lack sufficient information to admit or deny the allegations in Paragraph 372 of Plaintiffs' Complaint and therefore deny same.

373. Defendants lack sufficient information to admit or deny the allegations in Paragraph 373 of Plaintiffs' Complaint and therefore deny same.

374. Defendants lack sufficient information to admit or deny the allegations in Paragraph 374 of Plaintiffs' Complaint and therefore deny same.

375. Defendants lack sufficient information to admit or deny the allegations in Paragraph 375 of Plaintiffs' Complaint and therefore deny same.

376. Defendants lack sufficient information to admit or deny the allegations in Paragraph 376 of Plaintiffs' Complaint and therefore deny same.

**Defendant Midwest's Alleged Termination of Plaintiffs Roberto Antonio Cuamba Razo and Marco Antonio Olivares Perez in June 2015**

377. Defendants lack sufficient information to admit or deny the allegations in Paragraph 377 and therefore deny same.

378. Defendants lack sufficient information to admit or deny the allegations in Paragraph 378 and therefore deny same.

379. Defendants lack sufficient information to admit or deny the allegations in Paragraph 379 and therefore deny same.

380. Defendants lack sufficient information to admit or deny the allegations in Paragraph 380 and therefore deny same.

381. Defendants lack sufficient information to admit or deny the allegations in Paragraph 381 and therefore deny same.



382. Defendants lack sufficient information to admit or deny the allegations in Paragraph 382 and therefore deny same.

383. Defendants lack sufficient information to admit or deny the allegations in Paragraph 383 and therefore deny same.

384. Defendants lack sufficient information to admit or deny the allegations in Paragraph 384 and therefore deny same.

385. Defendants lack sufficient information to admit or deny the allegations in Paragraph 385 and therefore deny same, except Defendants expressly deny that Salvador Mendoza was an agent of Defendant ATJ.

386. Defendants lack sufficient information to admit or deny the allegations in Paragraph 386 and therefore deny same.

387. Defendants lack sufficient information to admit or deny the allegations in Paragraph 387 and therefore deny same.

**Remaining Plaintiffs' Alleged Exodus from Defendant Midwest on August 15, 2015**

388. Defendants lack sufficient information to admit or deny the allegations in Paragraph 388 of Plaintiffs' Complaint and therefore deny same.

389. Defendants lack sufficient information to admit or deny the allegations in Paragraph 389 of Plaintiffs' Complaint and therefore deny same.

390. Defendants lack sufficient information to admit or deny the allegations in Paragraph 390 of Plaintiffs' Complaint and therefore deny same.

391. Defendants lack sufficient information to admit or deny the allegations in Paragraph 391 of Plaintiffs' Complaint and therefore deny same.

392. Defendants lack sufficient information to admit or deny the allegations in Paragraph 392 of Plaintiffs' Complaint and therefore deny same.

393. Defendants lack sufficient information to admit or deny the allegations in Paragraph 393 of Plaintiffs' Complaint and therefore deny same.

394. Defendants lack sufficient information to admit or deny the allegations in Paragraph 394 of Plaintiffs' Complaint and therefore deny same.

395. Defendants lack sufficient information to admit or deny the allegations in Paragraph 395 of Plaintiffs' Complaint and therefore deny same.

396. Defendants lack sufficient information to admit or deny the allegations in Paragraph 396 of Plaintiffs' Complaint and therefore deny same.

397. Defendants lack sufficient information to admit or deny the allegations in Paragraph 397 of Plaintiffs' Complaint and therefore deny same.

398. Defendants lack sufficient information to admit or deny the allegations in Paragraph 398 of Plaintiffs' Complaint and therefore deny same.

399. Defendants lack sufficient information to admit or deny the allegations in Paragraph 399 of Plaintiffs' Complaint and therefore deny same.

400. Defendants lack sufficient information to admit or deny the allegations in Paragraph 400 of Plaintiffs' Complaint and therefore deny same.

401. Defendants lack sufficient information to admit or deny the allegations in Paragraph 401 of Plaintiffs' Complaint and therefore deny same.

402. Defendants lack sufficient information to admit or deny the allegations in Paragraph 402 of Plaintiffs' Complaint and therefore deny same.

403. Defendants lack sufficient information to admit or deny the allegations in Paragraph 403 of Plaintiffs' Complaint and therefore deny same.

404. Defendants lack sufficient information to admit or deny the allegations in Paragraph 404 of Plaintiffs' Complaint and therefore deny same.

405. Defendants lack sufficient information to admit or deny the allegations in Paragraph 405 of Plaintiffs' Complaint and therefore deny same.

406. Defendants lack sufficient information to admit or deny the allegations in Paragraph 406 of Plaintiffs' Complaint and therefore deny same.

407. Defendants lack sufficient information to admit or deny the allegations in Paragraph 407 of Plaintiffs' Complaint and therefore deny same.

**FIRST CLAIM FOR RELIEF**  
**FEDERAL FAIR LABOR STANDARDS ACT ("FLSA")**  
**29 U.S.C. § 203 ET SEQ. (2015)**

408. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

409. With respect to Paragraph 409 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 409 of Plaintiffs' Complaint.

410. With respect to Paragraph 410 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 410 of Plaintiffs' Complaint.

411. With respect to Paragraph 411 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 411 of Plaintiffs' Complaint.

412. With respect to Paragraph 412 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 412 of Plaintiffs' Complaint.

413. With respect to Paragraph 413 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 413 of Plaintiffs' Complaint.

414. With respect to Paragraph 414 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 414 of Plaintiffs' Complaint.

415. With respect to Paragraph 415 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 415 of Plaintiffs' Complaint.

416. With respect to Paragraph 416 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the

extent a response is required, Defendants deny the allegations in Paragraph 416 of Plaintiffs' Complaint.

417. With respect to Paragraph 417 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 417 of Plaintiffs' Complaint.

418. With respect to Paragraph 418 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 418 of Plaintiffs' Complaint.

419. With respect to Paragraph 419 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 419 of Plaintiffs' Complaint.

420. With respect to Paragraph 420 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 420 of Plaintiffs' Complaint.

421. With respect to Paragraph 421 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 421 of Plaintiffs' Complaint.

422. With respect to Paragraph 422 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 422 of Plaintiffs' Complaint.

423. With respect to Paragraph 423 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 423 of Plaintiffs' Complaint.

424. With respect to Paragraph 424 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 424 of Plaintiffs' Complaint.

425. With respect to Paragraph 425 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 425 of Plaintiffs' Complaint.

426. With respect to Paragraph 426 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 426 of Plaintiffs' Complaint.

427. With respect to Paragraph 427 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the

extent a response is required, Defendants deny the allegations in Paragraph 427 of Plaintiffs' Complaint.

428. With respect to Paragraph 428 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 428 of Plaintiffs' Complaint.

429. With respect to Paragraph 429 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 429 of Plaintiffs' Complaint.

430. With respect to Paragraph 430 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 430 of Plaintiffs' Complaint.

**SECOND CLAIM FOR RELIEF**  
**MINNESOTA FAIR LABOR STANDARDS ACT**  
**Wage Claims, Minn. Stat. § 177 et seq. (2015)**

431. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

432. With respect to Paragraph 432 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 432 of Plaintiffs' Complaint.

433. With respect to Paragraph 433 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 433 of Plaintiffs' Complaint.

434. With respect to Paragraph 434 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 434 of Plaintiffs' Complaint.

435. With respect to Paragraph 435 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 435 of Plaintiffs' Complaint.

436. With respect to Paragraph 436 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 436 of Plaintiffs' Complaint.

437. With respect to Paragraph 437 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 437 of Plaintiffs' Complaint.

438. With respect to Paragraph 438 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the



extent a response is required, Defendants deny the allegations in Paragraph 438 of Plaintiffs' Complaint.

439. With respect to Paragraph 439 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 439 of Plaintiffs' Complaint.

440. With respect to Paragraph 440 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 440 of Plaintiffs' Complaint.

441. With respect to Paragraph 441 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 441 of Plaintiffs' Complaint.

442. With respect to Paragraph 442 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 442 of Plaintiffs' Complaint.

443. With respect to Paragraph 443 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 443 of Plaintiffs' Complaint.

444. With respect to Paragraph 444 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 444 of Plaintiffs' Complaint.

445. With respect to Paragraph 445 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 445 of Plaintiffs' Complaint.

446. With respect to Paragraph 446 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 446 of Plaintiffs' Complaint.

**THIRD CLAIM FOR RELIEF**  
**MINNESOTA FAIR LABOR STANDARDS ACT**  
**Working Conditions, Minn. Stat. § 177 et seq. (2015)**

447. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

448. With respect to Paragraph 448 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 448 of Plaintiffs' Complaint.

449. With respect to Paragraph 449 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the

extent a response is required, Defendants deny the allegations in Paragraph 449 of Plaintiffs' Complaint.

450. With respect to Paragraph 450 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 450 of Plaintiffs' Complaint.

451. With respect to Paragraph 451 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 451 of Plaintiffs' Complaint.

452. With respect to Paragraph 452 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 452 of Plaintiffs' Complaint.

453. With respect to Paragraph 453 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 453 of Plaintiffs' Complaint.

454. With respect to Paragraph 454 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 454 of Plaintiffs' Complaint.

**FOURTH CLAIM FOR RELIEF**  
**MINNESOTA WAGE PAYMENT**  
**Minn. Stat. § 181 et seq. (2015)**

455. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

456. With respect to Paragraph 456 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 456 of Plaintiffs' Complaint.

457. With respect to Paragraph 457 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 457 of Plaintiffs' Complaint.

458. With respect to Paragraph 458 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 458 of Plaintiffs' Complaint.

459. With respect to Paragraph 459 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 459 of Plaintiffs' Complaint.

460. With respect to Paragraph 460 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the

extent a response is required, Defendants deny the allegations in Paragraph 460 of Plaintiffs' Complaint.

461. With respect to Paragraph 461 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 461 of Plaintiffs' Complaint.

462. With respect to Paragraph 462 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 462 of Plaintiffs' Complaint.

**FIFTH CLAIM FOR RELIEF**  
**MINNESOTA WAGE PAYMENT ACT**  
**False Statements as Inducement to Entering Employment**  
**Minn. Stat. §§ 181.64, 181.65 (2015)**

463. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

464. Paragraph 464 of Plaintiffs' Complaint is an informational statement to which no response is required. To the extent a response is required, Defendants deny the statement in Paragraph 464 of Plaintiffs' Complaint.

465. Paragraph 465 of Plaintiffs' Complaint is an informational statement to which no response is required. To the extent a response is required, Defendants deny the statement in Paragraph 465 of Plaintiffs' Complaint.

466. Defendants deny the allegations in Paragraph 466 of Plaintiffs' Complaint.

467. Defendants deny the allegations in Paragraph 467 of Plaintiffs' Complaint.

468. Defendants deny the allegations in Paragraph 468 of Plaintiffs' Complaint.

469. Defendants deny the allegations in Paragraph 469 of Plaintiffs' Complaint.

**SIXTH CLAIM FOR RELIEF**  
**TRAFFICKING VICTIMS PROTECTION ACT (TVPRA)**  
**Forced Labor, 18 U.S.C. § 1589 (2015)**

470. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

471. With respect to Paragraph 471 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 471 of Plaintiffs' Complaint.

472. With respect to Paragraph 472 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 472 of Plaintiffs' Complaint.

473. With respect to Paragraph 473 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 473 of Plaintiffs' Complaint.

474. With respect to Paragraph 474 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the

extent a response is required, Defendants deny the allegations in Paragraph 474 of Plaintiffs' Complaint.

475. With respect to Paragraph 475 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 475 of Plaintiffs' Complaint.

476. With respect to Paragraph 476 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 476 of Plaintiffs' Complaint.

477. With respect to Paragraph 477 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 477 of Plaintiffs' Complaint.

478. With respect to Paragraph 478 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 478 of Plaintiffs' Complaint.

479. With respect to Paragraph 479 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 479 of Plaintiffs' Complaint.

480. With respect to Paragraph 480 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 480 of Plaintiffs' Complaint.

481. With respect to Paragraph 481 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 481 of Plaintiffs' Complaint.

**SEVENTH CLAIM FOR RELIEF**  
**TVRA**  
**Human Trafficking 18 U.S.C. § 1590 (2015)**

482. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

483. Paragraph 483 of Plaintiffs' Complaint is an informational statement to which no response is required. To the extent a response is required, Defendants deny the statement in Paragraph 483 of Plaintiffs' Complaint.

484. Paragraph 484 of Plaintiffs' Complaint is an informational statement to which no response is required. To the extent a response is required, Defendants deny the statement in Paragraph 484 of Plaintiffs' Complaint.

485. Defendants deny the allegations in Paragraph 485 of Plaintiffs' Complaint.

486. Defendants deny the allegations in Paragraph 486 of Plaintiffs' Complaint.

487. Defendants deny the allegations in Paragraph 487 of Plaintiffs' Complaint.

488. Defendants deny the allegations in Paragraph 488 of Plaintiffs' Complaint.



489. Defendants deny the allegations in Paragraph 489 of Plaintiffs' Complaint.

490. Defendants deny the allegations in Paragraph 490 of Plaintiffs' Complaint.

**EIGHTH CLAIM FOR RELIEF**  
**MINNESOTA LABOR TRAFFICKING CRIMES**  
**Minn. Stat. § 609.281 et seq. (2015)**

491. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

492. Paragraph 492 of Plaintiffs' Complaint is an informational statement to which no response is required. To the extent a response is required, Defendants deny the statement in Paragraph 492 of Plaintiffs' Complaint.

493. Paragraph 493 of Plaintiffs' Complaint is an informational statement to which no response is required. To the extent a response is required, Defendants deny the statement in Paragraph 493 of Plaintiffs' Complaint.

494. Defendants deny the allegations in Paragraph 494 of Plaintiffs' Complaint.

495. Defendants deny the allegations in Paragraph 495 of Plaintiffs' Complaint.

496. Defendants deny the allegations in Paragraph 496 of Plaintiffs' Complaint.

497. Defendants deny the allegations in Paragraph 497 of Plaintiffs' Complaint.

498. Defendants deny the allegations in Paragraph 498 of Plaintiffs' Complaint.

499. Defendants deny the allegations in Paragraph 499 of Plaintiffs' Complaint.

500. Defendants deny the allegations in Paragraph 500 of Plaintiffs' Complaint.

501. Defendants deny the allegations in Paragraph 501 of Plaintiffs' Complaint.

502. Defendants deny the allegations in Paragraph 502 of Plaintiffs' Complaint.

503. Defendants deny the allegations in Paragraph 503 of Plaintiffs' Complaint.

504. Defendants deny the allegations in Paragraph 504 of Plaintiffs' Complaint.

**NINTH CLAIM FOR RELIEF**  
**ALIEN TORT CLAIMS ACT, 28 U.S.C. § 1350**  
**Involuntary Servitude and Forced Labor**

505. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

506. Paragraph 506 of Plaintiffs' Complaint is an informational statement to which no response is required. To the extent a response is required, Defendants deny the statement in Paragraph 506 of Plaintiffs' Complaint.

507. Defendants deny the allegations in Paragraph 507 of Plaintiffs' Complaint.

508. Defendants deny the allegations in Paragraph 508 of Plaintiffs' Complaint.

509. Defendants deny the allegations in Paragraph 509 of Plaintiffs' Complaint.

510. Defendants deny the allegations in Paragraph 510 of Plaintiffs' Complaint.

511. Defendants deny the allegations in Paragraph 511 of Plaintiffs' Complaint.

512. Defendants deny the allegations in Paragraph 512 of Plaintiffs' Complaint.

513. Defendants deny the allegations in Paragraph 513 of Plaintiffs' Complaint.

514. Defendants deny the allegations in Paragraph 514 of Plaintiffs' Complaint.

515. Defendants deny the allegations in Paragraph 515 of Plaintiffs' Complaint.

516. Defendants deny the allegations in Paragraph 516 of Plaintiffs' Complaint.

**TENTH CLAIM FOR RELIEF**  
**ALIEN TORT CLAIMS ACT, 28 U.S.C. § 1350**  
**Human Trafficking**

517. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

518. Paragraph 518 of Plaintiffs' Complaint is an informational statement to which no response is required. To the extent a response is required, Defendants deny the statement in Paragraph 518 of Plaintiffs' Complaint.

519. Defendants deny the allegations in Paragraph 519 of Plaintiffs' Complaint.

520. Defendants deny the allegations in Paragraph 520 of Plaintiffs' Complaint.

521. Defendants deny the allegations in Paragraph 521 of Plaintiffs' Complaint.

522. Defendants deny the allegations in Paragraph 522 of Plaintiffs' Complaint.

523. Defendants deny the allegations in Paragraph 523 of Plaintiffs' Complaint.

524. Defendants deny the allegations in Paragraph 524 of Plaintiffs' Complaint.

525. Defendants deny the allegations in Paragraph 525 of Plaintiffs' Complaint.

526. Defendants deny the allegations in Paragraph 526 of Plaintiffs' Complaint.

527. Defendants deny the allegations in Paragraph 527 of Plaintiffs' Complaint.

528. Defendants deny the allegations in Paragraph 528 of Plaintiffs' Complaint.

529. Defendants deny the allegations in Paragraph 529 of Plaintiffs' Complaint.

**ELEVENTH CLAIM FOR RELIEF**  
**FEDERAL RACKETEERING INFLUENCED CORRUPT**  
**ORGANIZATIONS ACT ("RICO")**  
**18 U.S.C. § 1961 et seq. (2015)**

530. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

531. Paragraph 531 of Plaintiffs' Complaint is an informational statement to which no response is required. To the extent a response is required, Defendants deny the statement in Paragraph 531 of Plaintiffs' Complaint.

532. Defendants deny the allegations in Paragraph 532 of Plaintiffs' Complaint.

533. Defendants deny the allegations in Paragraph 533 of Plaintiffs' Complaint.

534. Defendants deny the allegations in Paragraph 534 of Plaintiffs' Complaint.

**The Alleged RICO Enterprise**

535. Defendants deny the allegations in Paragraph 535 of Plaintiffs' Complaint.

536. Defendants deny the allegations in Paragraph 536 of Plaintiffs' Complaint.

537. Defendants deny the allegations in Paragraph 537 of Plaintiffs' Complaint.

538. Defendants deny the allegations in Paragraph 538 of Plaintiffs' Complaint, except state Defendant ATJ provided certain lawful services to Defendant Midwest.

539. Defendants deny the allegations in Paragraph 539 of Plaintiffs' Complaint.

540. Defendants deny the allegations in Paragraph 540 of Plaintiffs' Complaint.

541. Defendants deny the allegations in Paragraph 541 of Plaintiffs' Complaint.

542. Defendants deny the allegations in Paragraph 542 of Plaintiffs' Complaint, except state Defendant ATJ provided certain lawful services to Defendant Midwest.

**RICO Defendants' Alleged Roles in the Enterprise**

543. Defendants deny the allegations in Paragraph 543 of Plaintiffs' Complaint except state Defendant ATJ provided certain lawful services to Defendant Midwest.

544. Defendants deny the allegations in Paragraph 544 of Plaintiffs' Complaint except state Defendant ATJ provided certain lawful services to Defendant Midwest.

545. Defendants deny the allegations in Paragraph 545 of Plaintiffs' Complaint except state Defendant ATJ provided certain lawful services to Defendant Midwest.

546. Defendants deny the allegations in Paragraph 546 of Plaintiffs' Complaint except state Defendant ATJ provided certain lawful services to Defendant Midwest.

547. Defendants lack sufficient information to admit or deny the allegations in Paragraph 547 of Plaintiffs' Complaint and therefore deny same.

548. Defendants lack sufficient information to admit or deny the allegations in Paragraph 548 of Plaintiffs' Complaint and therefore deny same.

549. Defendants deny the allegations in Paragraph 549 of Plaintiffs' Complaint.

550. Defendants deny the allegations in Paragraph 550 of Plaintiffs' Complaint.

551. Defendants deny the allegations in Paragraph 551 of Plaintiffs' Complaint.

**Alleged Predicate Acts**  
**Alleged Forced Labor: 18 U.S.C. § 1589**

552. Defendants deny the allegations in Paragraph 552 of Plaintiffs' Complaint.

553. Defendants deny the allegations in Paragraph 553 of Plaintiffs' Complaint.

554. Defendants lack sufficient information to admit or deny the allegations in Paragraph 554 of Plaintiffs' Complaint and therefore deny same.

555. Defendants deny the allegations in Paragraph 555 of Plaintiffs' Complaint.

**Alleged Trafficking in Persons for the Purposes of Forced Labor and Involuntary Servitude:**  
**18 U.S.C. § 1590 and Minn. Stat. § 609.281 et seq.**

556. Defendants deny the allegations in Paragraph 556 of Plaintiffs' Complaint.

557. Defendants deny the allegations in Paragraph 557 of Plaintiffs' Complaint.

558. Defendants deny the allegations in Paragraph 558 of Plaintiffs' Complaint.

559. Defendants deny the allegations in Paragraph 559 of Plaintiffs' Complaint.

560. Defendants deny the allegations in Paragraph 560 of Plaintiffs' Complaint.

561. Defendants deny the allegations in Paragraph 561 of Plaintiffs' Complaint, and all subparts therein.

562. Defendants deny the allegations in Paragraph 562 of Plaintiffs' Complaint.

563. Defendants deny the allegations in Paragraph 563 of Plaintiffs' Complaint.

**Alleged Immigration Document Fraud: 18 U.S.C. § 1546**

564. Defendants deny the allegations in Paragraph 564 of Plaintiffs' Complaint.

565. Defendants deny the allegations in Paragraph 565 of Plaintiffs' Complaint.

566. Defendants deny the allegations in Paragraph 566 of Plaintiffs' Complaint.

567. With respect to Paragraph 567 of Plaintiffs' Complaint, Defendants state that the referenced documents speak for themselves. Further answering, to the extent an additional response is required, Defendants deny the allegations in Paragraph 567 of Plaintiffs' Complaint and/or any inference of liability contained therein.

568. With respect to Paragraph 568 of Plaintiffs' Complaint, Defendants state that the referenced documents speak for themselves. Further answering, to the extent an additional response is required, Defendants deny the allegations in Paragraph 568 of Plaintiffs' Complaint and/or any inference of liability contained therein.

569. With respect to Paragraph 569 of Plaintiffs' Complaint, Defendants state that the referenced documents speak for themselves. Further answering, to the extent an additional response is required, Defendants deny the allegations in Paragraph 569 of Plaintiffs' Complaint and/or any inference of liability contained therein.

570. With respect to Paragraph 570 of Plaintiffs' Complaint, Defendants state that the referenced documents speak for themselves. Further answering, to the extent an additional response is required, Defendants deny the allegations in Paragraph 570 of Plaintiffs' Complaint and/or any inference of liability contained therein.

571. Defendants lack sufficient information to admit or deny the allegations in Paragraph 571 of Plaintiffs' Complaint and therefore deny same.

572. Defendants lack sufficient information to admit or deny the allegations in Paragraph 572 of Plaintiffs' Complaint and therefore deny same.

573. Defendants lack sufficient information to admit or deny the allegations in Paragraph 573 of Plaintiffs' Complaint and therefore deny same.

574. Defendants lack sufficient information to admit or deny the allegations in Paragraph 574 of Plaintiffs' Complaint and therefore deny same.

575. Defendants lack sufficient information to admit or deny the allegations in Paragraph 575 of Plaintiffs' Complaint and therefore deny same.

576. Defendants lack sufficient information to admit or deny the allegations in Paragraph 576 of Plaintiffs' Complaint and therefore deny same.

577. Defendants deny the allegations in Paragraph 577 of Plaintiffs' Complaint.

**Alleged Mail Fraud: 18 U.S.C. § 1341**

578. Defendants deny the allegations in Paragraph 578 of Plaintiffs' Complaint.

579. Defendants deny the allegations in Paragraph 579 of Plaintiffs' Complaint.

580. Defendants deny the allegations in Paragraph 580 of Plaintiffs' Complaint.

581. Defendants deny the allegations in Paragraph 581 of Plaintiffs' Complaint.

582. Defendants deny the allegations in Paragraph 582 of Plaintiffs' Complaint.

**Alleged Wire Fraud: 18 U.S.C. § 1343**

583. Defendants deny the allegations in Paragraph 583 of Plaintiffs' Complaint.

584. Defendants deny the allegations in Paragraph 584 of Plaintiffs' Complaint.

585. Defendants deny the allegations in Paragraph 585 of Plaintiffs' Complaint.

586. Defendants deny the allegations in Paragraph 586 of Plaintiffs' Complaint, except state Defendant ATJ communicated with Defendant Midwest.

587. Defendants deny the allegations in Paragraph 587 of Plaintiffs' Complaint, except state Defendant ATJ communicated with Defendant Midwest.

588. Defendants deny the allegations in Paragraph 588 of Plaintiffs' Complaint.

589. Defendants deny the allegations in Paragraph 589 of Plaintiffs' Complaint.

**Alleged Pattern of Racketeering Activity**

590. Defendants deny the allegations in Paragraph 590 of Plaintiffs' Complaint.

591. Defendants deny the allegations in Paragraph 591 of Plaintiffs' Complaint.

592. Defendants deny the allegations in Paragraph 592 of Plaintiffs' Complaint.

593. Defendants deny the allegations in Paragraph 593 of Plaintiffs' Complaint.

594. Defendants deny the allegations in Paragraph 594 of Plaintiffs' Complaint.

595. Defendants deny the allegations in Paragraph 595 of Plaintiffs' Complaint.

596. Defendants deny the allegations in Paragraph 596 of Plaintiffs' Complaint.

597. Defendants deny the allegations in Paragraph 597 of Plaintiffs' Complaint.

**Alleged Conspiracy**

598. Defendants deny the allegations in Paragraph 598 of Plaintiffs' Complaint.



599. Defendants deny the allegations in Paragraph 599 of Plaintiffs' Complaint.

600. Defendants deny the allegations in Paragraph 600 of Plaintiffs' Complaint.

601. Defendants deny the allegations in Paragraph 601 of Plaintiffs' Complaint.

602. Defendants deny the allegations in Paragraph 602 of Plaintiffs' Complaint.

603. Defendants deny the allegations in Paragraph 603 of Plaintiffs' Complaint.

604. Defendants deny the allegations in Paragraph 604 of Plaintiffs' Complaint.

605. Defendants deny the allegations in Paragraph 605 of Plaintiffs' Complaint.

606. Defendants deny the allegations in Paragraph 606 of Plaintiffs' Complaint.

607. Defendants deny the allegations in Paragraph 607 of Plaintiffs' Complaint.

608. Defendants deny the allegations in Paragraph 608 of Plaintiffs' Complaint.

609. Defendants deny the allegations in Paragraph 609 of Plaintiffs' Complaint.

610. Defendants deny the allegations in Paragraph 610 of Plaintiffs' Complaint.

611. Defendants deny the allegations in Paragraph 611 of Plaintiffs' Complaint.

### **Alleged Injury**

612. Defendants deny the allegations in Paragraph 612 of Plaintiffs' Complaint.

613. Defendants deny the allegations in Paragraph 613 of Plaintiffs' Complaint.

### **TWELFTH CLAIM FOR RELIEF ASSAULT**

614. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

615. With respect to Paragraph 615 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the

extent a response is required, Defendants deny the allegations in Paragraph 615 of Plaintiffs' Complaint.

616. With respect to Paragraph 616 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 616 of Plaintiffs' Complaint.

617. With respect to Paragraph 617 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 617 of Plaintiffs' Complaint.

618. With respect to Paragraph 618 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 618 of Plaintiffs' Complaint.

619. With respect to Paragraph 619 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 619 of Plaintiffs' Complaint.

620. With respect to Paragraph 620 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 620 of Plaintiffs' Complaint.

621. With respect to Paragraph 621 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 621 of Plaintiffs' Complaint.

622. With respect to Paragraph 622 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 622 of Plaintiffs' Complaint.

**THIRTEENTH CLAIM FOR RELIEF**  
**BATTERY**

623. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

624. With respect to Paragraph 624 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 624 of Plaintiffs' Complaint.

625. With respect to Paragraph 625 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 625 of Plaintiffs' Complaint.

626. With respect to Paragraph 626 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the

extent a response is required, Defendants deny the allegations in Paragraph 626 of Plaintiffs' Complaint.

627. With respect to Paragraph 627 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 627 of Plaintiffs' Complaint.

628. With respect to Paragraph 628 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 628 of Plaintiffs' Complaint.

629. With respect to Paragraph 629 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 629 of Plaintiffs' Complaint.

630. With respect to Paragraph 630 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 630 of Plaintiffs' Complaint.

**FOURTEENTH CLAIM FOR RELIEF**  
**BREACH OF H-2B CONTRACT**

631. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

632. With respect to Paragraph 632 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 632 of Plaintiffs' Complaint.

633. With respect to Paragraph 633 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 633 of Plaintiffs' Complaint.

634. With respect to Paragraph 634 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 634 of Plaintiffs' Complaint.

635. With respect to Paragraph 635 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 635 of Plaintiffs' Complaint.

636. With respect to Paragraph 636 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 636 of Plaintiffs' Complaint.

637. With respect to Paragraph 637 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the

extent a response is required, Defendants deny the allegations in Paragraph 637 of Plaintiffs' Complaint.

638. With respect to Paragraph 638 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 638 of Plaintiffs' Complaint.

639. With respect to Paragraph 639 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 639 of Plaintiffs' Complaint.

640. With respect to Paragraph 640 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 640 of Plaintiffs' Complaint.

641. With respect to Paragraph 641 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 641 of Plaintiffs' Complaint.

642. With respect to Paragraph 642 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 642 of Plaintiffs' Complaint.

643. With respect to Paragraph 643 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 643 of Plaintiffs' Complaint.

644. With respect to Paragraph 644 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 644 of Plaintiffs' Complaint.

**FIFTEENTH CLAIM FOR RELIEF  
PROMISSORY ESTOPPEL**

645. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

646. Defendants deny the allegations in Paragraph 646 of Plaintiffs' Complaint.

647. Defendants deny the allegations in Paragraph 647 of Plaintiffs' Complaint.

648. Defendants deny the allegations in Paragraph 648 of Plaintiffs' Complaint.

649. Defendants deny the allegations in Paragraph 649 of Plaintiffs' Complaint.

650. Defendants deny the allegations in Paragraph 650 of Plaintiffs' Complaint.

651. Defendants deny the allegations in Paragraph 651 of Plaintiffs' Complaint.

652. Defendants deny the allegations in Paragraph 652 of Plaintiffs' Complaint.

**SIXTEENTH CLAIM FOR RELIEF  
UNJUST ENRICHMENT AND QUANTUM MERUIT**

653. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

654. With respect to Paragraph 654 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 654 of Plaintiffs' Complaint.

655. With respect to Paragraph 655 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 655 of Plaintiffs' Complaint.

656. With respect to Paragraph 656 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 656 of Plaintiffs' Complaint.

657. With respect to Paragraph 657 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 657 of Plaintiffs' Complaint.

658. With respect to Paragraph 658 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 658 of Plaintiffs' Complaint.

659. With respect to Paragraph 659 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the



extent a response is required, Defendants deny the allegations in Paragraph 659 of Plaintiffs' Complaint.

660. With respect to Paragraph 660 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 660 of Plaintiffs' Complaint.

661. With respect to Paragraph 661 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 661 of Plaintiffs' Complaint.

**SEVENTEENTH CLAIM FOR RELIEF**  
**MINNESOTA BIAS OFFENSE**  
**Minn. Stat. § 611A.79 (2015)**

662. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

663. Paragraph 663 of Plaintiffs' Complaint contains an informational statement for the reader, to which no response is required. To the extent a response is required, Defendants state that the information provided in Paragraph 663 of Plaintiffs' Complaint speaks for itself.

664. Defendants deny the allegations in Paragraph 664 of Plaintiffs' Complaint.

665. Defendants deny the allegations in Paragraph 665 of Plaintiffs' Complaint.

666. Defendants deny the allegations in Paragraph 666 of Plaintiffs' Complaint.

667. Defendants deny the allegations in Paragraph 667 of Plaintiffs' Complaint.

668. Defendants deny the allegations in Paragraph 668 of Plaintiffs' Complaint.

**EIGHTEENTH CLAIM FOR RELIEF**  
**COMMON LAW FRAUD**

669. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

670. Paragraph 670 of Plaintiffs' Complaint contains an informational statement for the reader, to which no response is required. To the extent a response is required, Defendants state that the information provided in Paragraph 670 of Plaintiffs' Complaint speaks for itself.

671. Defendants deny the allegations in Paragraph 671 of Plaintiffs' Complaint.

672. Defendants deny the allegations in Paragraph 672 of Plaintiffs' Complaint.

673. Defendants deny the allegations in Paragraph 673 of Plaintiffs' Complaint.

674. Defendants deny the allegations in Paragraph 674 of Plaintiffs' Complaint.

675. Defendants deny the allegations in Paragraph 675 of Plaintiffs' Complaint.

676. Defendants deny the allegations in Paragraph 676 of Plaintiffs' Complaint.

677. Defendants deny the allegations in Paragraph 677 of Plaintiffs' Complaint.

678. Defendants deny the allegations in Paragraph 678 of Plaintiffs' Complaint.

**NINETEENTH CLAIM FOR RELIEF**  
**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

679. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

680. With respect to Paragraph 680 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the

extent a response is required, Defendants deny the allegations in Paragraph 680 of Plaintiffs' Complaint.

681. With respect to Paragraph 681 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 681 of Plaintiffs' Complaint.

682. With respect to Paragraph 682 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 682 of Plaintiffs' Complaint.

683. With respect to Paragraph 683 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 683 of Plaintiffs' Complaint.

684. With respect to Paragraph 684 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 684 of Plaintiffs' Complaint.

685. With respect to Paragraph 685 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 685 of Plaintiffs' Complaint.

686. With respect to Paragraph 686 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 686 of Plaintiffs' Complaint.

**TWENTIETH CLAIM FOR RELIEF**  
**NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

687. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

688. With respect to Paragraph 688 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 688 of Plaintiffs' Complaint.

689. With respect to Paragraph 689 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 689 of Plaintiffs' Complaint.

690. With respect to Paragraph 690 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 690 of Plaintiffs' Complaint.

691. With respect to Paragraph 691 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the

extent a response is required, Defendants deny the allegations in Paragraph 691 of Plaintiffs' Complaint.

692. With respect to Paragraph 692 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 692 of Plaintiffs' Complaint.

693. With respect to Paragraph 693 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 693 of Plaintiffs' Complaint.

694. With respect to Paragraph 694 of Plaintiffs' Complaint, Defendants state that the allegations are not directed at Defendants and no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 694 of Plaintiffs' Complaint.

**TWENTY-FIRST CLAIM FOR RELIEF**  
**MEXICAN FEDERAL LABOR LAW**

695. Defendants reassert and incorporate their responses to all previous paragraphs set forth above as if restated herein.

696. Paragraph 696 of Plaintiffs' Complaint contains an informational statement for the reader, to which no response is required. To the extent a response is required, Defendants state that the information provided in Paragraph 696 of Plaintiffs' Complaint speaks for itself.

697. Paragraph 697 is a legal conclusion to which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 697 of Plaintiffs' Complaint.

698. Defendants deny the allegations in Paragraph 698 of Plaintiffs' Complaint.

699. Defendants deny the allegations in Paragraph 699 of Plaintiffs' Complaint.

700. Defendants deny the allegations in Paragraph 700 of Plaintiffs' Complaint.

701. Defendants deny the allegations in Paragraph 701 of Plaintiffs' Complaint.

#### **ALLEGED PRAYER FOR RELIEF**

Defendants deny Plaintiffs' right to the damages or relief requested in the Complaint, and deny Plaintiffs' right to any other damages or relief related to the Complaint, including any and all relief requested in Plaintiffs' "Prayer for Relief" Section.

#### **AFFIRMATIVE AND OTHER DEFENSES**

Further answering, Defendants allege the following affirmative and other defenses:

702. Plaintiffs' Complaint fails, in whole or in part, to state a claim upon which relief may be granted, including but not limited to failing to state a claim under the cited statutory provisions. Further, Plaintiffs' Complaint fails to state facts sufficient to state a claim that would support an award of actual, compensatory, punitive, or other damages against Defendants.

703. Plaintiffs' claims against Defendants must be dismissed because this Court lacks personal jurisdiction.

704. Plaintiffs' claims against Defendants must be dismissed for improper venue.

705. Plaintiffs' claims against Defendants must be dismissed to the extent the Court lacks subject matter and/or supplemental jurisdiction over those claims.

706. Plaintiffs' Complaint is barred, in whole or in part, because of the applicable statutes of limitations and/or because of other applicable statutory requirements.

707. Plaintiffs have failed to identify any actionable fraud or misrepresentation claim with the requisite specificity, and they therefore cannot establish the elements of their claims.

708. Plaintiffs' Complaint fails because Defendants did not make any false representations to Plaintiffs and there were no statements made with knowledge of falsity or with disregard for their truth or falsity.

709. Plaintiffs' Complaint fails, in whole or in part, because Plaintiffs consented to, ratified, and/or invited the alleged conduct about which they now complain.

710. Plaintiffs' Complaint fails because Defendants did not have the requisite intent to induce Plaintiffs to act in reliance on any alleged statements or representations.

711. Plaintiffs' Complaint fails because any representations or statements made by Defendants did not cause Plaintiffs to act in reliance thereon.

712. Plaintiffs' Complaint fails because any reliance based on any statements was not justifiable.

713. Plaintiffs' RICO claim is barred, in whole or in part, for failure of proximate cause.

714. Plaintiffs' claims fail, in whole or in part, because there was no conspiracy.

715. Plaintiffs' claimed damages are barred, in whole or in part, because Plaintiffs suffered no recoverable damages, Plaintiffs failed to mitigate their alleged damages, if any, and Plaintiffs' damages, if any, are limited by operation of the claims they have made.

716. Plaintiffs' claims and/or claimed damages fail, in whole or in part, to the extent Plaintiffs seek multiple recoveries for the same alleged conduct.

717. Plaintiffs' claimed damages are barred to the extent the cited statutes do not permit the relief requested.

718. Plaintiffs' claimed damages, if any, were caused by their own conduct or by the conduct of other persons or entities over whom/which Defendants had no control and for whose conduct Defendants are not liable.

719. Plaintiffs' Complaint fails, in whole or in part, because Defendants acted in good faith, upon proper occasion, and with proper motive. Defendants' conduct with respect to Plaintiffs was not in violation of any statute, law, rule, regulation, or ordinance. No action taken by Defendants with respect to Plaintiffs was unlawful and/or willful as a matter of law.

720. Plaintiffs' Complaint fails because of bars to recovery such as waiver, estoppel, and/or unclean hands.



721. The extent to which Plaintiffs' Complaint may be barred by any remaining affirmative or other defenses, including those contemplated by Rule 8 of the Federal Rules of Civil Procedure, cannot be determined at this time without the benefit of discovery. Thus, as separate and alternative defenses to Plaintiffs' Complaint, Defendants reserve their right to assert all affirmative and other defenses as appropriate.

WHEREFORE, Defendants request a trial by jury and the following relief:

- (a) That the Court dismiss the Complaint with prejudice, in its entirety;
- (b) That the Court deny Plaintiffs the relief prayed for in the Complaint; and
- (c) That the Court award Defendants their costs, disbursements and such further relief as the Court deems just and equitable.

Dated: February 26, 2016

OGLETREE, DEAKINS, NASH, SMOAK  
& STEWART, P. C.

s/Colton D. Long

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